

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Muhammad K. Abbasi

Debtor(s)

**Nationstar Mortgage LLC d/b/a Mr.
Cooper**

Movant

vs.

Muhammad K. Abbasi

Debtor(s)

William C. Miller Esq.

Trustee

BK NO. 20-13321 ELF

Chapter 13

**NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER'S NOTICE OF
DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19
PANDEMIC**

Now comes Creditor Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 3 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 1/1/2021 through 3/1/2021. Creditor holds a secured interest in real property commonly known as 747 Clinton Avenue Bensalem, PA 19020 as evidenced by claim number 10-1 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 4/1/2021 and will be required to cure the delinquency created by the forbearance period (hereinafter

“forbearance arrears”). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully Submitted,

/s/Rebecca A. Solarz Esquire
Rebecca A. Solarz Esquire
Attorney for Creditor